

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Requests for Waiver by Various)	
Petitioners to Allow the Establishment)	PS Docket No. 06-229
Of 700 MHz Interoperable Public Safety)	
Wireless Broadband Networks)	
)	

1. This filing is the joint response of the 700 MHz public safety broadband waiver recipients (Petitioners)¹ to the requirement contained in paragraph 18 of Order DA 12-25, which the Public Safety and Homeland Security Bureau adopted on January 9, 2012 (“Order”). Paragraph 18 requires Petitioners to retain the services of a common administrator to oversee the development and implementation of a network numbering scheme.

2. Through the assistance of the Department of Homeland Security’s Office of Emergency Communications (DHS/OEC), Petitioners have selected Science Applications International Corporation (SAIC) to serve as the common numbering administrator for the purposes described in the Order. Petitioners intend to assign SAIC each of the responsibilities stated in paragraph 19 of the Order. DHS/OEC will bear the costs of SAIC’s services.

3. Per paragraph 21 of the Order, Petitioners request the Bureau’s approval of SAIC as the numbering administrator.

¹ In May 2010, the Commission granted conditional waivers to twenty-one public safety jurisdictions to pursue early deployment of the public safety broadband network in the public safety broadband spectrum. See Requests for Waiver of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks, PS Docket 06-229, Order, 25 FCC Rcd 5145, 5147 ¶ 7 (2010) (*Waiver Order*). The Bureau granted a twenty-second waiver, in May 2011, to the State of Texas (Texas) and required Texas to adhere to the cumulative conditions imposed on the initial waiver recipients. See Requests for Waiver of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks, PS Docket 06-229, Order, 26 FCC Rcd 6783 (PSHSB 2011) (*Texas Waiver Order*). For purposes of this filing, the term “Petitioners” includes the State of Texas.

4. SAIC meets each of the minimum qualifications identified in paragraph 18 the Order, specifically:

- a. Five years of demonstrated experience. SAIC serves as Canadian Number Administrator (CNA) since 1999. The CNA provides a telephony numbering administration service to the Canadian telecommunications industry under contract to the Canadian Numbering Administration Consortium Inc. This work includes the design, development, implementation, maintenance and backup strategies of multiple databases and websites (both secure and public). The main database is designed and used for the assignment of various telephony numbering resources such as Central Office Codes (CO Codes), Emergency Service Routing Digit (ESRD) codes and Mobile Identification Number (MIN) Block Identifiers Block (MBI) codes and the production of various reports/web pages.
- b. Security credentials. SAIC established and maintained the NASA IT Security Program and Response Center. SAIC also, since 2004, supports the Centers for Disease Control (CDC) Public Health Information Network (PHIN), which includes end-to-end payload PKI encryption and transport-layer SSL encryption, and supporting multiple credential types through configuration (X.509, SAML 2.0, Federated credentials, etc.) and nonrepudiation.
- c. Affiliations. SAIC is a large corporation. In addition, each of the Petitioners are large, complicated organizations composed of many departments and thousands and hundreds of thousands of employees. Insofar as the Petitioners can determine at this time, SAIC is not an FCC licensee or is affiliated with any FCC licensee. SAIC is not a Petitioner, and, insofar as we can determine SAIC is not affiliated with any of the Petitioners. Because the Petitioners cannot definitively determine compliance with these conditions, we request waiver of these conditions of Paragraph 18 of the Order.

5. The Petitioners discussed the contents of this filing during a conference call on February 2, 2012. I, William M. Schrier, Chief Technology Officer for the City of Seattle and Chair of the Public Safety Spectrum Trust Operator Advisory Committee (PSST-OAC), the formal organization of the Petitioners, hereby declare the undersigned jurisdictions consented to this filing via electronic mail message subsequent to that call.

Respectfully submitted,

/s/

William M. Schrier
Chief Technology Officer
City of Seattle, Washington

/s/

Adams County-Denver Airport
By Brian Shepherd
Deputy Director, ADCOM 911

/s/

Bay Area Core Cities
(City and County of San Francisco,
City of San Jose and City of Oakland)
By: Ken Gordon
Interim Director
Department of Information Technology
City of Oakland

/s/

The City of Boston
By Donald Denning
Public Safety CIO

/s/

The City of Charlotte
By Charles L. K. Robinson
Director
Business Support Services

/s/

The City of Chesapeake
By Bernie Reaser
Radio Systems Administrator

/s/

District of Columbia
By Rob Mancini
Chief Technology Officer

/s/

The State of Iowa
By Dina McKenna
Chair, Iowa Statewide Interoperable
Communications System Board

/s/

State of Hawai'i
By Todd M. Crosby
Office of Information Management and
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/s/

Los Angeles Regional Interoperable
Communications System
By Patrick Mallon
Executive Director

/s/

City of Mesa
By Randy Thompson
Communications Administrator

/s/

State of Mississippi
By Bill Buffington
Mississippi Wireless Communication
Commission

/s/

State of New Mexico
By Darryl Ackley,
State Chief Information Officer and
Secretary of Information Technology

/s/

The State of Oregon
By Steve Noel,
Statewide Interoperability Coordinator
(SWIC)

/s/

City of Pembroke Pines
By Anthony Soviero,
Consultant/Counsel

/s/

State of Texas
By Todd Early
Texas Department of Public Safety Deputy
Assistant Director and
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/s/

State of New Jersey
By E. Steven Emanuel
Chief Information Officer
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City of New York City
By Deputy Chief Charles Dowd
New York City Police Department

/s/

State of New York
By Robert M. Barbato
Statewide Interoperability Coordinator &
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Foxcomm supporting the Wisconsin
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By Thomas Swadley
Management Information Coordinator

/s/

The City of Seattle, Washington

By William M. (Bill) Schrier

Chief Technology Officer